

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

**NOTICE OF CROSS MOTION
FOR PROTECTIVE ORDER**

TO: Adam M. Slater, Esq.
Plaintiffs' Liaison Counsel
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Roseland, NJ 07068

PLEASE TAKE NOTICE that on June 7, 2021, or as soon thereafter as counsel may be heard, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), Princeton Pharmaceutical Inc. ("Princeton"), Solco Healthcare US, LLC ("Solco"), and Huahai U.S. Inc. ("Huahai U.S."), and collectively with ZHP, Princeton, and Solco, "the ZHP Parties"), by and through their counsel in the above-captioned action, Duane Morris LLP, shall move before the Honorable Thomas Vanaskie (Ret.), Special Discovery Master to the United States District Court for the District of New Jersey, for entry of a Protective Order precluding the production of the custodial file of Baohua Chen.

PLEASE TAKE FURTHER NOTICE that in support of this cross motion, the ZHP Parties shall rely on the accompanying Brief in Opposition to Plaintiffs' Motion to Compel the Custodial File of Baohua Chen and in support of their Cross Motion for Protective Order.

PLEASE TAKE FURTHER NOTICE that, for the Court's convenience, a proposed form of Order pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys for the ZHP Parties request oral argument on this cross motion.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: May 14, 2021

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, Esq.
*Lead Counsel and Liaison
Counsel for Defendants*

DUANE MORRIS LLP

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